1 Vanessa R. Waldref United States Attorney Eastern District of Washington 3 Todd M. Swensen Assistant United States Attorney 402 E. Yakima Avenue, Suite 210 5 Yakima, Washington 98901 (509) 454-4425 6 7 IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON 8 9 UNITED STATES OF AMERICA, Case No.: 1:22-CR-02017-MKD-1 10 Plaintiff, 11 UNITED STATES' SENTENCING 12 **MEMORANDUM** v. 13 ALEXANDER SCOTT STEVENS, 14 Defendant. 15 16 17 The United States of America, by and through Vanessa R. Waldref, 18 United States Attorney for the Eastern District of Washington, and Todd M. 19 Swensen, Assistant United States Attorney, submits the following United States' 20 21 Sentencing Memorandum. 22 I. **Offense Level & Criminal History:** 23 The United States believes that the Total Offense Level and Criminal 24 25 History calculation as stated in paragraphs 32-43 and 104, respectively, of the 26 Presentence Investigation Report (PSIR) (ECF No. 66) are correct. 27 28

UNITED STATES' SENT. MEMO.

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II. Departures:

The United States has not identified any bases where an upward or downward departure is warranted in this case.

III. 18 U.S.C. § 3553(a):

The parties have agreed to recommend a sentence between 70 and 84 months. The PSIR calculates the Guidelines imprisonment range between 130-162 months. Nevertheless, that statutorily authorized maximum sentence here is 120 months. The United States will recommend a sentence of 84 months imprisonment and believes that 84 months—primarily based on Defendant's willingness to plead guilty, thereby saving the United States valuable time and resources—is sufficient to satisfy the purposes of Section 3553(a)(2) and is not greater than necessary.

DATED this 15th day of March 2023.

VANESSA R. WALDREF United States Attorney

<u>s/ Todd M. Swensen</u>TODD M. SWENSENAssistant United States Attorney

I hereby certify that on March 15, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, and a copy was emailed to the counsel of record in this case: Nick Mirr.

s/ Todd M. Swensen
Todd M. Swensen
Assistant United States Attorney
United States Attorney's Office
402 E. Yakima Ave., Suite 210
Yakima, WA 98901
(509) 454-4425

Fax: (509) 249-3297